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February 16, 2024

**VIA ECF**

The Honorable Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

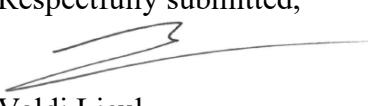
Re: Trooper 1 v. Cuomo, et al.; Case No. 22-cv-00893 (LDH) (TAM)

Dear Judge Merkl:

As you know we represent the Plaintiff in the above-titled action. We write jointly with all parties pursuant to the Court's Order dated January 16, 2024, Dkt. 220. The parties have agreed to the following dates for completing discovery:

1. Date for Governor Cuomo's answer: June 4, 2024
2. Close of party discovery: August 22, 2024
3. Close of nonparty discovery: November 15, 2024
4. Close of expert discovery: December 15, 2024, with the parties to confer closer to this time to determine specific dates for initial disclosures, rebuttals and depositions of experts.

Respectfully submitted,

  
Valdi Licul  
John S. Crain